

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

D-1 SAMUEL L. COONS,

Defendant.

Case: 2:22-cr-20428  
Assigned To : Edmunds, Nancy G.  
Referral Judge: Stafford, Elizabeth A.  
Filed: 8/17/2022  
INFO USA V COONS (LH)

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

*(21 U.S.C. §841(a)(1) – Possession with the Intent to Distribute a Controlled Substance (Cocaine))*

On or about October 16, 2019, in the Eastern District of Michigan, defendant SAMUEL COONS, did knowingly possess with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, §841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

**FORFEITURE ALLEGATIONS**  
*(21 U.S.C. § 853 and 28 U.S.C. § 2461)*

The allegations contained in this Information are incorporated by reference herein to allege forfeiture pursuant to the provisions of Title 21, United States Code, §853 and Title 28, United States Code, §2461(c).

**Title 21 Offense.** Upon conviction of a Title 21 offense charged in this Information, the defendant shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds which the defendant obtained, directly or indirectly, as the result of such violation, and (b) any property which the defendant used or intended to be used in any manner or part to commit or to facilitate the commission of such violation, and/or any property involved in such violation, including:

- One (1) Beretta 9mm semi-automatic handgun, serial number BER464104
- One (1) 9mm magazine and 17 rounds of ammunition.

**Substitute Assets.** Pursuant to Title 21, United States Code, §853(p), as incorporated by Title 18, United States Code, §982(b), the defendant shall forfeit substitute property, up to the value of the

property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

**Money Judgment.** The United States will seek judgment for a sum of money in United States currency in an amount up to the value of the property subject to forfeiture, as described above, resulting from the defendant's violations of Title 21 as alleged in this Information.

DAWN N. ISON  
United States Attorney

/s/ Benjamin Coats  
Chief, Drug Task Force Unit

/s/ John N. O'Brien II  
John N. O'Brien II  
Assistant United States Attorney

Date: August 17, 2022

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number 22-CR-20428
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number: 20-20584
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned: Victoria A. Roberts
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: JO

**Case Title:** USA v. Samuel L. Coons

**County where offense occurred :** Wayne

**Check One:**     **Felony**                             **Misdemeanor**                             **Petty**

      Indictment/  Information --- **no** prior complaint.  
       Indictment/        Information --- based upon prior complaint [Case number:       ]  
       Indictment/        Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

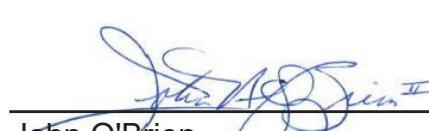
Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

August 17, 2022

Date



John O'Brien  
Assistant United States Attorney  
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Detroit, MI 48226-3277  
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Attorney Bar #: P39912

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.